

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:	Case No. 18-23538 (RDD)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF
ALL NOTICES, PLEADINGS, AND ORDERS**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

PLEASE TAKE NOTICE that Zachary P. Heller hereby appears on behalf of 3M Company, 3M Puerto Rico, and Meguiar's, Inc. ("Meguiar's"), pursuant to Section 1109(b) of the United States Bankruptcy Code, 11 U.S.C. §§ 101 - 1532 (the "Bankruptcy Code"), and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). 3M Company, 3M Puerto Rico, and Meguiar's hereby request, pursuant to Bankruptcy Rules 2002, 3017 and 9007, and the applicable Local Rules, that all notices given or required to be given in these cases and all papers served or required to be served in these cases, be given to and served upon the following:

Zachary P. Heller
Barnes & Thornburg LLP
655 West Broadway, Suite 900
San Diego, CA 92101
Telephone: (619) 321-5015
Facsimile: (310) 284-3894
Email: ZHeller@btlaw.com

PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, any order, notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telex or otherwise filed or made with regard to the referenced cases and proceedings herein.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim or suit shall waive any rights of 3M Company, 3M Puerto Rico, or Meguiar's to: (1) challenge the jurisdiction of the Court to adjudicate any matter, including, without limitation, any non-core matter; (2) have final orders in non-core matters entered only after *de novo* review by the District Court; (3) trial by jury in any proceeding so triable in these cases or any case,

controversy or proceeding related to these cases; (4) have the District Court withdraw that reference in any matter subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions, setoffs, or recoupments to which 3M Company, 3M Puerto Rico and Meguiar's, are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: March 10, 2020

Respectfully submitted,

/s/ Zachary P. Heller
Zachary P. Heller
Barnes & Thornburg LLP
655 West Broadway, Suite 900
San Diego, CA 92101
Telephone: (619) 321-5015
Facsimile: (310) 284-3894
Email: ZHeller@btlaw.com

Attorneys for 3M Company, 3M Puerto Rico, and Meguiar's, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Appearance was served on March 10, 2020 through the Court's CM/ECF System on all parties registered to receive service through the Court's CM/ECF system.

/s/ Zachary P. Heller
Zachary P. Heller
Barnes & Thornburg LLP
655 West Broadway, Suite 900
San Diego, CA 92101
Telephone: (619) 321-5008
Facsimile: (310) 284-3894
Email: ZHeller@btlaw.com